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**From:** "Vincent Pan" <vpan@caasf.org>  
**To:** <lwoodlock@fppc.ca.gov>  
**Date:** 04/02/2008 3:32 PM  
**Subject:** March 13, 2008 Agenda Item #9

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Chairman Ross Johnson  
Fair Political Practices Commission  
428 J Street, Suite 620  
Sacramento, CA 95814

**RE: March 13, 2008 Agenda Item #9**  
**Permanent Adoption of Emergency Regulation 18413**

Dear Chairman Johnson,

I write on behalf of Chinese for Affirmative Action (CAA) regarding the adoption of Emergency Regulation 18413. CAA is a 501(c)(3) non-profit organization based in San Francisco.

As other advocates have pointed out, how Regulation 18413 defines a "multipurpose" organization is a significant issue for many groups. As drafted, the Regulation makes certain reporting alternatives available only to 501(c)(4) organizations and not 501(c)(3) organizations. This will subject 501(c)(3) organizations to more burdensome disclosure requirements than their 501(c)(4) counterparts.

I urge you to remedy this situation by making the necessary changes so that 501(c)(3) organizations can access the same reporting options as 501(c)(4) organizations.

Thank you for your time and consideration.

Sincerely,

Vincent Pan  
Executive Director  
Chinese for Affirmative Action

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San Francisco, CA 94108